

1 **EXHIBIT 8**

2 **UNITED STATES DISTRICT COURT**

3 **DISTRICT OF NEVADA**

4 **DREW J. RIBAR,**

5 Plaintiff, Pro Se  
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Counsel/Parties of Record			
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Clerk U.S. District Court			Deputy
District of Nevada			
By:			

10 vs.

11 **WASHOE COUNTY, et al.**

12 Defendants.

13  
14  
15 Case No.: 3:24-cv-00526-ART-CLB

16  
17 **EXHIBIT 8**

18  
19  
20 **Title:** Internal Communications Between Washoe County Library System and Build Our Center,  
21 Inc. (BOC) Regarding Library-Community Partnership and Future Event Planning

22  
23 **Date:** January 20 - February 1, 2023

24  
25 **Source:** Internal email correspondence among Washoe County Library System officials and  
26 BOC representatives

27  
28 **Bates Number Range:** EXH033 – EXH039

PLEADING TITLE - 1

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2  
**Description:**

3  
4  
5 This exhibit contains internal emails exchanged between Washoe County Library System  
6 (WCLS) officials and representatives of Build Our Center, Inc. (BOC), including:

- 7  
8     • **Jeff Scott** (Library Director, WCLS)  
9     • **Beate Weinert** (Youth Services and Library Events Manager, WCLS)  
10    • **Jamie Hemingway** (Public Information and Development Officer, WCLS)  
11    • **Judy Hansen** (WCLS Staff Member)  
12    • **Stacey Spain** (Programs and Operations Manager, BOC)  
13    • **Angeline Peterson** (Board Member, BOC)

14  
15 The emails confirm the following:  
16

- 17    1. **Formal Partnership:** WCLS and BOC scheduled a meeting on February 1, 2023, held at  
18       Our Center, a private nonprofit location, to discuss future collaboration.  
19  
20    2. **Event Coordination:** WCLS officials planned LGBTQIA+ programming, including  
21       Drag Queen Story Hour (DQSH) and other initiatives, in conjunction with BOC.  
22  
23    3. **Exclusive Government Support:** WCLS offered venue access and cross-promotion to  
24       BOC, providing government benefits to a private advocacy group.  
25  
26    4. **Policy Influence:** BOC played a role in WCLS's programming decisions, confirming  
27       viewpoint-based favoritism and government endorsement of a specific message.

1           **Relevance to Case:**

2           This exhibit is critical in establishing:

3           **1. First and Fourteenth Amendment Violations:**

- 4
- 5           ○ Demonstrates that **WCLS engaged in viewpoint-based discrimination**, in  
6           violation of the **First Amendment** (*Rosenberger v. Rector*, 515 U.S. 819 (1995)).  
7
- 8           ○ Supports **Fourteenth Amendment Equal Protection claims** by proving WCLS  
9           favored one advocacy group while denying similar access to others.

10

11           **2. State Actor Theory & Monell Liability:**

- 12
- 13           ○ Supports Plaintiff's argument that **BOC functioned as a state actor** by working  
14           in partnership with WCLS, making BOC subject to constitutional restraints  
15           (\*\**Lugar v. Edmondson Oil Co.*, 457 U.S. 922 (1982)).  
16
- 17           ○ Establishes **municipal liability under Monell v. Dept. of Social Services**, 436  
18           U.S. 658 (1978) by showing that high-ranking WCLS officials exercised  
19           discretion in partnering with certain organizations while excluding others.

20

21           **3. Refuting BOC's Motion to Dismiss:**

- 22
- 23           ○ BOC was not merely a private entity but had **administrative and decision-**  
24           **making authority** within public programming.  
25
- 26           ○ The financial benefit conferred upon BOC through free venue access and taxpayer  
27           resources strengthens Plaintiff's argument against dismissal.

28           **CERTIFICATE OF AUTHENTICITY**

PLEADING TITLE - 3

1 I, **Drew J. Ribar**, certify under penalty of perjury that the attached documents are **true and**  
2 **correct copies** of internal communications obtained via public records requests and directly from  
3 the Washoe County Library System, and they accurately represent the content as received.  
4

5 **Dated:** March 17, 2025  
6

7 **Respectfully submitted,**  
8 **/s/ Drew J. Ribar**  
9 Drew J. Ribar, Pro Se  
3480 Pershing Ln  
Washoe Valley, NV 89704  
10 (775) 223-7899  
11 Const2Audit@gmail.com  
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**From:** Weinert, Beate <BWeinert@washoecounty.gov>  
**Sent:** 01 February 2023 20:02  
**To:** Hemingway, Jamie  
**Cc:** Scott, Jeff; Hansen, Judy  
**Subject:** Re: Wed, 2/1, 2pm @ Our Center Re: Meeting with WCLS Re: Our Center Partnership Meeting  
**Attachments:**

Hooray, thanks Jamie --see you soon ☺

With Much Gratitude,  
Beate

</A> Beate Weinert  
Youth Services and Library Events Manager | Washoe County Library System  
[bweinert@washoecounty.gov](mailto:bweinert@washoecounty.gov) | Office: 775.327.8361  
301 S. Center Street, Reno, NV 89501  
</A> [</A>](#) [</A>](#) [</A>](#)

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**From:** Hemingway, Jamie &lt;[JHemingway@washoecounty.gov](mailto:JHemingway@washoecounty.gov)&gt;;  
**Sent:** Wednesday, February 1, 2023 11:54 AM  
**To:** Weinert, Beate &lt;[BWeinert@washoecounty.gov](mailto:BWeinert@washoecounty.gov)&gt;;  
**Cc:** Scott, Jeff &lt;[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)&gt;; Hansen, Judy &lt;[JHansen@washoecounty.gov](mailto:JHansen@washoecounty.gov)&gt;;  
**Subject:** Re: Wed, 2/1, 2pm @ Our Center Re: Meeting with WCLS Re: Our Center Partnership Meeting

Hi Beate,

I'm thinking I'll probably attend the meeting with you today.

EXH 033

I'd also love to introduce you to the folks next door to Our Center at the Radical Cat book store. They're another local ally in this type of thing.

If I need to bow out for any reason I'll email you beforehand.

Thanks,

Jamie

—  
Jamie Hemingway  
Interim Public Information and Development Officer | Washoe County Library System  
[jhemingway@washoecounty.gov](mailto:jhemingway@washoecounty.gov) | Office: 775-327-8360  
301 South Center Street, Reno, NV 89501

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**From:** Weinert, Beate &lt;[BWeinert@washoecounty.gov](mailto:BWeinert@washoecounty.gov)&gt;  
**Sent:** Friday, January 27, 2023 2:00 PM  
**To:** Stacey Spain &lt;[stacey@ourcenterreno.org](mailto:stacey@ourcenterreno.org)&gt;; Angeline Peterson &lt;[angelinempeterson@gmail.com](mailto:angelinempeterson@gmail.com)&gt;  
**Cc:** Scott, Jeff &lt;[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)&gt;; Hemingway, Jamie &lt;[JHemingway@washoecounty.gov](mailto:JHemingway@washoecounty.gov)&gt;; Hansen, Judy &lt;[JHansen@washoecounty.gov](mailto:JHansen@washoecounty.gov)&gt;  
**Subject:** Wed, 2/1, 2pm @ Our Center Re: Meeting with WCLS Re: Our Center Partnership Meeting

Fabulous! We look forward to meeting with you both on Wednesday, 2/1, 2pm at Our Center ☺

EXH D34

With Much Gratitude,  
Beate

</A> Beate Weinert  
Youth Services and Library Events Manager | Washoe County Library System  
[bweinert@washoecounty.gov](mailto:bweinert@washoecounty.gov) | Office: 775.327.8361  
301 S. Center Street, Reno, NV 89501  
</A> </A> </A> </A>

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**From:** Stacey Spain &lt;[stacey@ourcenterreno.org](mailto:stacey@ourcenterreno.org)&gt;  
**Sent:** Friday, January 27, 2023 10:54 AM  
**To:** Angeline Peterson &lt;[angelinempeterson@gmail.com](mailto:angelinempeterson@gmail.com)&gt;  
**Cc:** Weinert, Beate &lt;[BWeinert@washoecounty.gov](mailto:BWeinert@washoecounty.gov)&gt;; Scott, Jeff &lt;[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)&gt;; Hemingway, Jamie &lt;[JHemingway@washoecounty.gov](mailto:JHemingway@washoecounty.gov)&gt;; Hansen, Judy &lt;[JHansen@washoecounty.gov](mailto:JHansen@washoecounty.gov)&gt;  
**Subject:** Re: Meeting with WCLS Re: Our Center Partnership Meeting

[NOTICE: This message originated outside of Washoe County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Hi all anytime between 1:30 and 5 would work for me. What is your pleasure Beate?

On Fri, Jan 27, 2023 at 9:28 AM Angeline Peterson &lt;[angelinempeterson@gmail.com](mailto:angelinempeterson@gmail.com)&gt; wrote:

Hi Beate,

I apologize for the delay in my response. I would love to meet with you on Wednesday. I am available after 1:30 and would be happy to meet at Our Center. We can chat and give you a tour, if you have never been to the space. We could even grab some coffee next door at Magpie and it will be the best of both worlds :)

Stacey - what time would work best for you on Wednesday?

Thanks so much for reaching out. I look forward to meeting you!  
Angeline

EXH035

On Thu, Jan 26, 2023 at 6:48 PM Weinert, Beate &lt;[</A>](mailto:BWeinert@washoecounty.gov)&gt;; wrote:

Hello Stacey and Angeline!

Happy Friday eve ☺ Checking on your availability to meet with us. Would Wednesday, February 1 between noon and 5pm work for you? Let us know how you prefer to meet—over coffee, at Our Center, at the library or virtually? If the 1<sup>st</sup> doesn't work for you all, please let us know what would work for you.

With Much Gratitude,  
Beate

Beate Weinert  
Youth Services and Library Events Manager | Washoe County Library System  
[</A>](mailto:bweinert@washoecounty.gov) | Office: 775.327.8361  
301 S. Center Street, Reno, NV 89501

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**From:** Weinert, Beate &lt;[</A>](mailto:BWeinert@washoecounty.gov)&gt;  
**Sent:** Friday, January 20, 2023 12:32 PM  
**To:** [</A>](mailto:stacey@ourcenterreno.org) &lt;[</A>](mailto:stacey@ourcenterreno.org)&gt;; Angeline Peterson &lt;[</A>](mailto:angelinempeterson@gmail.com)&gt;;  
**Cc:** Hemingway, Jamie &lt;[</A>](mailto:JHemingway@washoecounty.gov)&gt;; Hansen, Judy &lt;[</A>](mailto:JHansen@washoecounty.gov)&gt;;  
**Subject:** Meeting with WCLS Re: Our Center Partnership Meeting

*EXH 036*

Happy Friday, Everyone!

Stacey and Angeline, we would love to meet with you to discuss how WCLS can collaborate on the below mentioned opportunities, with emphasis on the hosting of Drag Story Hours at a few of our libraries, and possibly in the community, this summer. How does Wednesday, February 1 between noon and 5pm work for you both? Let us know how you prefer to meet—over coffee, at Our Center, at the library or virtually?

Looking forward to working with you!

With Much Gratitude,  
Beate

</A> Beate Weinert  
Youth Services and Library Events Manager | Washoe County Library System  
[bweinert@washoecounty.gov](mailto:bweinert@washoecounty.gov) | Office: 775.327.8361  
301 S. Center Street, Reno, NV 89501  
</A> </A> </A> </A>

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From: Scott, Jeff &lt;[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)>&gt;  
Sent: Friday, November 18, 2022 3:53 PM  
To: [stacey@ourcenterreno.org](mailto:stacey@ourcenterreno.org)&lt;[stacey@ourcenterreno.org](mailto:stacey@ourcenterreno.org)&gt;; Angeline Peterson  
&lt;[angelinempeterson@gmail.com](mailto:angelinempeterson@gmail.com)&gt;;  
Cc: Weinert, Beate &lt;[BWeinert@washoecounty.gov](mailto:BWeinert@washoecounty.gov)&gt;; Hemingway, Jamie  
&lt;[JHemingway@washoecounty.gov](mailto:JHemingway@washoecounty.gov)&gt;; Andrews, John

EXH D37

&lt;[JAndrews@washoecounty.gov](mailto:JAndrews@washoecounty.gov)&gt;; Owens, Brenda &lt;[BOwens@washoecounty.gov](mailto:BOwens@washoecounty.gov)&gt;; Amy Ghilieri &lt;[aghexen@gmail.com](mailto:aghexen@gmail.com)&gt;  
**Subject:** Our Center Partnership Meeting

Stacy/Angeline,

Thank you for meeting with me this morning. I am very excited about our potential partnerships with Our Center.

I wanted to recap some of our conversations. I will include our library staff, who handle programs, events, Beate Weinert, and social media (Jamie Hemingway, John Andrews), and our Library Board of Trustees Chair, Amy Ghilieri. We can set up a follow-up meeting with the group to find the best ways to partner and support Our Center.

Notes from meeting with Our Center Reno (<https://ourcenterreno.org/>)

Met with Stacey Spain and Angeline Peterson with Our Center Reno regarding the collaboration of programs.

Upcoming:

Library will promote on Social Media Transgender Day of Remembrance on November 20<sup>th</sup> (Jamie and Jen have developed and have an accompanying book list)

January: Name Change/Gender Change workshop

October: Out West Film Fest: Sunday, October 15<sup>th</sup>, 2023, at Downtown Reno Library (will update Downtown to reserve the time)

Potential:

LGBTQ Chautauqua History series

Feminist Book Club Support

How to Create Change in Your Community

Civil Action Workshop

Plans for DQST will have an all-day event when a library hosts to ensure high attendance, music, and fun. We will start working on those plans soon.

We can work with Our Center for potential partnerships on programs and events to include in our brochure. We also have free meeting rooms available. This includes an auditorium at the Downtown Reno Library that seats 104 with a 4K projector and screen.

<https://www.washoecountylibrary.us/services/meeting-rooms.php>

Let me know if I missed anything. I will follow-up after the Thanksgiving break.

Thanks,

Jeff

</A> Jeff Scott  
Library Director | Washoe County Library System

EXH038

[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov) | Office: 775.327.8340  
301 S. Center Street, Reno, NV 89501

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Angeline M. Peterson

Operations Executive Administrator, StemExpress  
Education Advisor, Kappa Alpha Theta, Beta Mu Chapter  
Board Member, Our Center  
775.848.4987  
**Preferred pronouns: she/her/hers**

--

Stacey Spain  
Programs and Operations Manager

She/Her/Hers  
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PO Box 54 • Reno, NV 89504  
Phone: 775.624.3720 • Direct: 775.624.3716  
Stacey@OurCenterReno.org

EXH 039